

January 6, 2005

Office of Nutritional Products Labeling and Dietary Supplements (HFS-810) Center for Food Safety and Applied Nutrition U.S. Food and Drug Administration 5100 Paint Branch Parkway College Park, MD 20740-3835

Dear Sir or Madam;

This letter will serve as a 30-day notification, pursuant to 403 (r) (6) of the Federal Food, Drug & Cosmetic Act and regulations promulgated thereunder.

Product Manufacturer:

IdeaSphere Inc.

150 Motor Parkway Hauppauge, NY 11788

Text of statement being made: "antioxidant activity" "overall health and wellness"

"support the cardiovascular and immune systems"

Dietary supplement ingredients: Broccoli, Celery, Brussels Sprout, Kale, Cauliflower, Carrot, Green

Onion, Cabbage and Yam.

Dietary supplement brand and name: Twinlab Ultra Harvest PREMIUM VEGGIE TABLETS

As required, enclosed are two photocopies of this notification.

The signee certifies that the information contained in this notice is complete and accurate, and that IdeaSphere Inc., has substantiation that the statements being made are truthful and not misleading.

Sincerely,

Myron Lyskanycz

Vice President of Marketing

IdeaSphere Inc.

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Enclosures



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